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October 16, 2020

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Jennifer Eckhart v. Fox News Network, LLC, et al., Civil Case No. 1:20-cv-05593

Dear Judge Abrams:

I am writing on behalf of Defendant Edward Henry. As the Court knows, Mr. Henry's response to Plaintiff Jennifer Eckhart's Second Amended Complaint is due on Monday. Mr. Henry is writing now to seek the Court's permission to file a memorandum of law in support of his motions totaling 32 pages in length (a seven-page extension from the Court's current page limit). I have consulted with Michael Willemin, counsel for the Plaintiff, and he has informed me that the Plaintiff does not object to this request. Mr. Henry is not seeking to file an enlarged memorandum in response to Plaintiff Cathy Areu's Second Amended Complaint.

The reason for the enlargement of pages is because Mr. Henry is moving to dismiss each of the eight claims Plaintiff asserts against him. In addition, Mr. Henry intends to make a motion for a more definite statement along with his motion to dismiss and will be including argument in the same memorandum supporting this additional motion. Mr. Henry believes these reasons support a finding of good cause to grant the request for an enlargement. Accordingly, Mr. Henry respectfully requests that he be permitted to file a memorandum of 32 pages in length.

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Thank you for your consideration.

Respectfully submitted,

/s/ Catherine M. Foti

cc: All counsel of record (via ECF)